

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SIGNAL TECH, LLC

Plaintiff,

v.

LINEAR TECHNOLOGY CORPORATION,

Defendant.

No.

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Signal Tech, LLC, for its Complaint against Linear Technology Corporation, hereby alleges as follows:

Nature of the Case

1. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 271, *et seq.*, to enjoin and obtain damages resulting from Defendants' unauthorized manufacture, use, sale, offer to sell, and/or importation into the United States for subsequent use or sale of products and/or systems that infringe one or more claims of United States Patent No. 6,480,064, entitled "Method and Apparatus for an Efficient Low Voltage Switchable Gm Cell," ("the '064 Patent").

Parties

2. Signal Tech, LLC is a Delaware limited liability company that owns the '064 Patent.

3. Linear Technology Corporation ("Linear") is a Delaware Corporation with its principal place of business at 1630 McCarthy Boulevard, Milpitas, California 95035. Linear

Technology Corporation is engaged in the manufacture, sale, and/or importation in the United States of electronic components and systems that infringe the '064 Patent.

Jurisdiction and Venue

4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States.

5. This Court has personal jurisdiction over Linear because it has established minimum contacts with the forum state Delaware. Linear, directly and/or through third party manufacturers, manufactures, assembles, or distributes products that are and have been offered for sale, sold, purchased, and used within the state of Delaware. In addition, Linear, directly and/or through their distribution networks, regularly places its products within the stream of commerce, with the knowledge and/or understanding that such products will be sold in Delaware. Finally, Linear is subject to this Court's jurisdiction by virtue of its incorporation in Delaware.

6. Linear transacts business in the state of Delaware because, among other things, it distributes products that are offered for sale, sold, purchased, and used within the state of Delaware. Linear has also committed tortious acts of patent infringement in Delaware and is subject to personal jurisdiction in Delaware. Venue is thus proper in this district pursuant to 28 U.S.C. §§ 1391(b), (c), (d) and 1400 (b).

Cause of Action

7. Paragraphs 1 through 6 are incorporated by reference as if fully stated herein.

8. The '064 Patent was duly and legally issued on November 12, 2002, by the United States Patent and Trademark Office. A copy of the '064 Patent is attached hereto as Exhibit A.

9. Among other things, the '064 Patent claims a device that contains multiple Gm setting devices and a switching circuit connected to the Gm setting devices.

10. The '064 Patent is valid and enforceable.

11. Signal Tech, LLC, is the exclusive and current owner of all rights, title, and interest, in the '064 Patent, including the right to bring this suit for injunctive relief and damages.

12. Upon information and belief, Linear has infringed and continues to infringe one or more claims of the '064 Patent by engaging in acts that constitute infringement under 35 U.S.C. § 271, including but not necessarily limited to making, using, selling, and/or offering for sale, in Delaware and elsewhere in the United States, and/or importing into Delaware or elsewhere in the United States, devices that infringe the '064 Patent.

13. In violation of 35 U.S.C. § 271, Linear Technology Corporation has been infringing and continues to infringe one or more claims of the '064 Patent through at least the acts of making, using, selling, offering for sale and/or importing infringing products or systems. Linear Technology Corporation's infringing products include, without limitation, the LT5554 programmable gain amplifier and the LTC6915 programmable gain amplifier.

14. Linear's infringement of the '064 patent is exceptional and entitles Signal Tech, LLC, to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

Prayer for Relief

Wherefore Signal Tech, LLC prays:

- a. That this Court enter judgment that Linear has infringed United States Patent No. 6,480,064;
- b. That Signal Tech, LLC be awarded all damages adequate to compensate it for Linear's infringement of the '064 patent, such damages to be determined by a jury, plus pre and

post judgment interest and costs and if necessary to adequately compensate Signal Tech, LLC for the infringement, an accounting;

- c. That this case be declared an exceptional case within the meaning of 35 U.S.C. § 285 and that Signal Tech, LLC be awarded attorneys' fees, costs, and expenses incurred in connection with this action; and
- d. That Signal Tech, LLC be awarded such other and further relief as this Court deems just and proper.

Jury Demand

Plaintiff hereby demands a trial by jury of any issue triable by right by a jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

Dated: November 2, 2011

FARNAN LLP

By: /s/ Brian E. Farnan
Joseph J. Farnan, III (Bar No. 3945)
Brian E. Farnan (Bar No. 4089)
919 North Market Street, 12th Floor
Wilmington, Delaware 19801
(302) 777-0300
(302) 777-0301 (Fax)
bfarnan@farnanlaw.com

OF COUNSEL:
Daniel Kotchen
Daniel L. Low
Robert A. Klinck
Alicia Gutierrez
KOTCHEN & LOW LLP
2300 M Street NW, Suite 800
Washington, DC 20037
Telephone: (202) 416-1848
Facsimile: (202) 280-1128
dkotchen@kotchen.com

Attorneys for Signal Tech, LLC